

AGRAPIDIS & MAROULES, P.C.
777 Terrace Avenue, Suite 504
Hasbrouck Heights, New Jersey 07604
(201) 288-0500
ATTORNEYS FOR PLAINTIFF
YEESOO MA,

Plaintiff,

V.

COSTCO WHOLESALE OF TETERBORO:
and JOHN DOE I-III,

Defendants.

FROM THE STATE OF NEW JERSEY

TO THE DEFENDANT(S) NAMED ABOVE: Costco Wholesale of Teterboro

The Plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and Proof of Service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and Proof of Service with the Clerk of the Superior Court, Hughes Justice Complex, CN 971, Trenton, NJ 08625. A filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to Plaintiff's attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee and completed Case Information Statement) if you want the Court to hear your defense.*

If you do not file and serve a written Answer or Motion within 35 days, the Court may enter a judgment against you for the relief Plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services Office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: May 18, 2019

:SUPERIOR COURT OF NEW JERSEY
:LAW DIVISION: BERGEN COUNTY

:
:DOCKET NO: BER-L-2763-20

:
: CIVIL ACTION

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:
: **SUMMONS**
:
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:

Michelle M. Smith

Clerk, Superior Court of New Jersey

Name of defendant to be served: Costco Wholesale of Teterboro
Address for Service: 2 Teterboro Landing Drive
Teterboro, NJ 07608

***175.00 FOR CHANCERY DIVISION CASES OR \$175.00 FOR LAW DIVISION CASES**

BER-L-002763-20 05/11/2020 12:57:09 PM Pg 1 of 4 Trans ID: LOV2020858335

Paul E. Agrapidis, Esq., - # 247682018
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(201) 288-0500
ATTORNEYS FOR PLAINTIFF

YEESOO MA,

Plaintiff,

V.

COSTCO WHOLESALE OF TETERBORO:
and JOHN DOE I-III,

Defendants.

:SUPERIOR COURT OF NEW JERSEY
:LAW DIVISION: BERGEN COUNTY

:
:DOCKET NO:

:
: CIVIL ACTION
:
:

COMPLAINT AND JURY DEMAND

Plaintiff, Yesoon Ma, residing in Cliffside Park, Bergen County, New Jersey by way
of Complaint against the defendants, hereby alleges and says:

FIRST COUNT

1. At all times hereinafter mentioned, plaintiff, Yesoon Ma, was a lawful
business invitee of Costco Wholesale of Teterboro, located on the property at 2 Teterboro
Landing Drive, Teterboro, Bergen County, New Jersey, on August 19, 2019 when she slipped
on slippery liquid while walking in an aisle.

2. Upon information and belief, plaintiff, Yesoon Ma, fell due to a dangerous
and hazardous condition in the aisle on the property located at 2 Teterboro Landing Drive,
in the City of Teterboro, County of Bergen and State of New Jersey on August 19, 2019.
There were no warning signs for the slippery and dangerous condition.

3. Upon information and belief, defendant, Costco Wholesale of Teterboro, is responsible for the maintenance and management of the premises located at 2 Teterboro Landing Drive, in the City of Teterboro, County of Bergen and State of New Jersey. The defendant is believed to be the owner of that property.

4. Upon information and belief, and in the alternative to the allegations in paragraphs 2 & 3 above, the true name of capacity, whether individual, plural, corporate, partnership, associate or otherwise of defendants, JOHN DOE I-III, are unknown to plaintiff, who, therefore, brings suit against said defendants by such fictitious name. JOHN DOE I-III may be the true owner or operator or party responsible for the maintenance of the property located at 2 Teterboro Landing Drive, Teterboro, Bergen County and State of New Jersey on August 19, 2019, and is responsible for any dangerous conditions on the premises, for the maintenance and repair of the premises and well-being of plaintiff, Yeesoon Ma, but the full extent of those facts linking the fictitiously designated defendants with the cause of action alleged herein is unknown to plaintiff at this time.

5. As a direct and proximate result of the negligence of the defendants, Costco Wholesale of Teterboro and John Doe I-III, its agents, servants, and/or employees, in the manner in which said premises were maintained and controlled, the plaintiff, Yeesoon Ma, was caused to fall and sustain serious injury causing her to suffer great pain and will in the future be caused to suffer great pain; she was caused to incur medical expenses and will in the future be caused to incur medical expenses; she was caused to suffer permanent injury.

6. Upon information and belief, defendants had actual and/or constructive notice of the dangerous condition described above and failed to remedy this dangerous condition, take precautionary steps to prevent the accident, or give notice to those in the area thereby breaching their duty of care to plaintiff.

WHEREFORE, the plaintiff, Yesoon Ma, demands judgment against the defendants, Costco Wholesale of Teterboro and John Doe I-III, jointly and severally for damages, pain and suffering and infliction of emotional distress, together with attorney's fees, interest, costs of suit and any other relief the Court deems just and equitable.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ.

DATED: April 29, 2020

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues raised in the Complaint.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ

DATED: April 29, 2020

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Paul E. Agrapidis, Esq.(# 247682018), is hereby designated as Trial Counsel of this matter.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 
EVANS C. AGRAPIDIS, ESQ

DATED: April 29, 2020

CERTIFICATION

I certify that pursuant to R. 4:5-1, to my knowledge and based on the information

available to me at this time, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding and that no additional parties are known at this time who should be added.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:


EVANS C. AGRAPIDIS, ESQ

DATED: April 29, 2020

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to R. 4:17-1(b), the plaintiff hereby demands that the defendants provide answers to the Uniform Interrogatories set forth in Form C and C(2) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:


EVANS C. AGRAPIDIS, ESQ

DATED: April 29, 2020

BERGEN COUNTY COURTHOUSE
SUPERIOR COURT LAW DIV
BERGEN COUNTY JUSTICE CTR RM 415
HACKENSACK NJ 07601-7680

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 221-0700
COURT HOURS 8:30 AM - 4:30 PM

DATE: MAY 11, 2020
RE: MA YEESON VS COSTCO WHOLESALE OF TETERBORO
DOCKET: BER L -002763 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON PETER G. GEIGER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (201) 527-2600.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: PAUL E. AGRAPIDIS
AGRAPIDIS & MAROULES, PC
777 TERRACE AVE
STE 504
HASBROUCK HGTS NJ 07604

ECOURTS

Civil Case Information Statement

Case Details: BERGEN Civil Part Docket: L-002763-20

Case Caption: MA YEESOOON VS COSTCO WHOLESAL
OF TETERBORO

Case Initiation Date: 05/11/2020

Attorney Name: PAUL E AGRAPIDIS

Firm Name: AGRAPIDIS & MAROULES, PC

Address: 777 TERRACE AVE STE 504

HASBROUCK HGTS NJ 076040000

Phone: 2012880500

Name of Party: PLAINTIFF : Ma, Yeesoon

Name of Defendant's Primary Insurance Company
(if known): GALLAGHER BASSETT

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, Is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

05/11/2020

Dated

/s/ PAUL E AGRAPIDIS

Signed